

**A RESOLUTION BY COUNCILMEMBER CARLA SMITH
AS SUBSTITUTED BY CITY UTILITIES COMMITTEE**

AUTHORIZING PAYMENT OF STIPULATED PENALTIES IMPOSED BY THE ENVIRONMENTAL PROTECTION AGENCY (EPA) AND THE ENVIRONMENTAL PROTECTION DIVISION OF THE DEPARTMENT OF NATURAL RESOURCES OF THE STATE OF GEORGIA (EPD) IN THE AMOUNT OF THIRTY-ONE THOUSAND TWO HUNDRED FIFTY DOLLARS AND 00/100 (\$31,250.00) AS PENALTIES FOR THE VIOLATIONS OF OPERATIONAL STANDARDS AT THE CLEAR CREEK CSO (\$8,500.00) ON JUNE 14, 2008, SAMPLE COLLECTION STANDARDS AT THE INTRENCHMENT CREEK CSO (\$6,000.00) ON MAY 15, 2008 AND REPORTING STANDARDS AT SOUTH RIVER WWTP ON APRIL 16, 2008 (\$6,750.00) PURSUANT TO THE CSO CONSENT DECREE, CIVIL ACTION FILE NO. 1:95-CV-2550-TWT AND GUST RULE 391-3-15-.06; TO IDENTIFY THE SOURCE OF FUNDING; AND FOR OTHER PURPOSES.

WHEREAS, the City of Atlanta ("City") has experienced a violation of Operational and Collection Sample Standards as set out in Exhibit "A" hereto; and

WHEREAS, the City has experienced a violation of Reporting Standards as set out in Exhibit "B" hereto; and

WHEREAS, the City has experienced violation of Georgia Air Quality Act Standards as set out in Exhibit "C" hereto; and

WHEREAS, these violations are subject to stipulated penalties imposed at the discretion of the Environmental Protection Agency (EPA) and/or the Environmental Protection Division of the Department of Natural Resources of the State of Georgia (EPD) pursuant to the CSO Consent Decree, Civil Action File No. 1:95-CV-2550-TWT, GUST Rule 391-3-15-.06, Georgia Air Quality Act O.C.G.A. 12-9-1 and Georgia Rules for Air Quality Control Chapter 391-3-1; and

WHEREAS, the Department of Watershed Management of the City does not dispute the fact these violations did occur; and

WHEREAS, the payment to EPA and EPD of this assessment by the City does not constitute a finding or adjudication, is not to be evidence of a violation of state or federal laws by the City, nor does the City by its consent agree to any violations of state or federal laws or admit any liability to any third party or parties; and

WHEREAS, funds for this purpose are available in Fund, Department and Account Number 5051 (Water & Wastewater Revenue Fund) 170201 (DWM Wastewater Treatment & Collections) 5750002 (Property/Liquidation) 4310000 (Sanitary Administration); and

WHEREAS, the CSO Consent Decree, Section XI. O. similarly provides for payment of interest on late payment of stipulated penalties; and

WHEREAS, it is deemed to be in the interest of the City to accept the proposed stipulated penalties and to pay the incident assessments to them.

NOW, THEREFORE, BE AND IT IS RESOLVED BY THE COUNCIL OF THE CITY OF ATLANTA, GEORGIA that the Chief Financial Officer of the City is authorized to issue checks in the amounts of Twenty-Four Thousand Dollars and 00/100 (\$24,000.00) payable to the State of Georgia and Seven Thousand Two Hundred Fifty Dollars and 00/100 (\$7,250.00) payable to the Treasurer, United States of America as stipulated penalties imposed pursuant to the CSO Consent Decree and GUST Rule 391-3-15-.06 at the discretion of the Environmental Protection Agency and the Environmental Protection Division of the Department of Natural Resources of the State of Georgia for said violations of Operational Standards at the Clear Creek CSO (\$8,500.00) on June 14, 2008, Sample Collection Standards at the Intrenchment Creek CSO (\$6,000.00) on May 15, 2008, Reporting Standards at South River WWTP on April 16, 2008 (\$6,750.00), and violations listed in the Proposed Consent Order dated May 21, 2008 (\$10,000.00).

AND FINALLY BE IT RESOLVED, that the said payments be charged to and paid from Fund, Department and Account Number 5051 (Water & Wastewater Revenue Fund) 170201 (DWM Wastewater Treatment & Collections) 5750002 (Property/Liquidation) 4310000 (Sanitary Administration).

Exhibit A

The City is subject to stipulated penalties for violations of the CSO Consent Decree as follows:

Section XI.D.1. Fecal coliform violation

| Date | Facility | Fecal coliform | Penalty | Comment: |
|------------|-----------------|--|-----------|---------------------|
| 06/14/2008 | Clear Creek CSO | Failure to maintain adequate operation Standards | \$8500.00 | (68000colony/100ml) |

Standard operating standard is 2,000colony/100ml (daily max)

Section XI.F.10 Failure to sample.

| Date | Facility | Composites Samples | Penalty | Comment |
|------------|------------------|--------------------|-----------|--------------------------------------|
| 05/15/2008 | Intrenchment CSO | Failure to sample | \$6000.00 | Failure to sample Composites Samples |

Exhibit B

Georgia Department of Natural Resources

Environmental Protection Division
Underground Storage Tank Management Program
4244 International Parkway, Suite 104, Atlanta, Georgia 30354
Ngel Holcomb, Commissioner
Carol A. Couch, Ph.D., Director
(404) 362-2687

January 23, 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7003 2260 0000 4304 5419

Mr. Sylvester Richards
Bureau of Wastewater Treatment
2640 Jonesboro Road, SE
Atlanta, Georgia 30315

SUBJECT: Notice of Violation:
Proposed Expedited Consent Order
Underground Storage Tank (UST) system
South River WWTP
955 South River Industrial Blvd., SE
Atlanta, GA; Fulton County
Facility ID: 9060808

Dear Mr. Richards:

The Environmental Protection Division (EPD), has determined that the subject UST facility has violated the Georgia Rules for Underground Storage Tank Management, Chapter 391-3-15 (GUST Rules), which incorporate Title 40 of the Code of Federal Regulations, Part 280 (40 CFR 280). The specific violation identified, and recommendation for corrective action follows:

- **GUST Rule 391-3-15-.06 [40 CFR § 280.34]; Failure to cooperate and comply with a document submission request from EPD by not submitting a Closure Report Addendum:** A Notice of Violation (NOV) dated, April 16, 2007, was transmitted to you for failure to submit a Closure Report Addendum, that was due on November 13, 2006. EPD requested at that time: (1) that the Closure Report should be properly signed by the UST owner and removal contractor and submitted with original signatures; (2) that the original laboratory data and chain of custody be submitted; (3) that soil samples should have been analyzed for BTEX, PAHs, TPH-DRO, and TPH-GRO; and (4) that a figure showing the soil samples and their location be submitted. Therefore, you are required to submit the past due Closure Report Addendum to EPD immediately.

EPD is offering to resolve this violation and settle this matter through the enclosed "Expedited Consent Order" (Consent Order). If you agree to the terms of the Consent Order, please correct the violation immediately, and within 30 days of receipt of this NOV according to the instructions on page two of the Consent Order remit payment of the negotiated settlement amount along with the signed Consent Order and records documenting the immediate correction of the violation cited. If you choose not to accept the terms of this Consent Order, EPD may choose to address this matter through other formal enforcement methods.

GEORGIA ENVIRONMENTAL PROTECTION DIVISION
UNDERGROUND STORAGE TANK MANAGEMENT PROGRAM

4244 INTERNATIONAL PKWY, SUITE 104
ATLANTA, GA 30354

Exhibit B

EXPEDITED CONSENT ORDER

PART I: CONSENT ORDER

PART II: MUTUAL AGREEMENT

Facility ID: 9060808

SouthRiver WWTP

(Name of Facility)

955 South River Industrial Blvd., SE

(Address of Facility)

Atlanta, Georgia 30315 [Fulton]

(City, State, Zip Code)

Name of Responsible Party (Owner/Operator/Supplier):

Mr. Sylvester Richards

Bureau of Wastewater Treatment

(Company)

2640 Jonesboro Road, SE

(Mailing Address)

Atlanta, Georgia 30315

(City, State, Zip Code)

The Georgia Environmental Protection Division (EPD) has documented substantial violations of the Georgia Underground Storage Tank Act, 12-13-1 et seq. of the Official Code of Georgia Annotated (GUSTA) and with the Georgia Rules for Underground Storage Tank Management (GUST Rules), Chapter 391-3-15, which incorporate Title 40 of the Code of Federal Regulations Part 280 (40 CFR 280) as promulgated thereunder. The violation(s) of the GUST Rules documented are listed below and the conditions for achieving compliance are established on the attached Notice of Violation letter. Consistent with section 12-13-19 of the GUSTA, a corresponding negotiated settlement amount for each violation is proposed as follows:

391-3-15-.06 [40 CFR 280.34], Settlement: \$6,750

Nature of Violation: Failure to submit a Closure Report Addendum

TOTAL SETTLEMENT AMOUNT: \$6,750

The Responsible Party of the above facility is hereby ordered to correct the violation and pay the settlement described above.

This Consent Order is issued solely with reference to the Mutual Agreement in Part II of this form. If the Mutual Agreement in Part II is not returned in correct form by the Responsible Party within 30 days of receipt, this Consent Order can be withdrawn without prejudice to EPD's ability to file additional enforcement actions for the above cited violation or any other violations.

The Georgia Environmental Protection Division (EPD) offers this Standardized Mutual Agreement Consent Order (Consent Order) as an enforcement procedure to settle the violation(s) listed in Part I of this form subject to the following terms and conditions:

The Responsible Party, by signing below certifies under penalty of law that: a) the information submitted in this and all attached documents have been personally examined, and the Responsible Party is familiar with the information; b) the cited violation(s) will be corrected immediately; c) the Responsible Party will provide to EPD immediately upon completion of the corrective actions, but no later than thirty (30) days of receipt of the Consent Order, documentation of compliance completion; and d) payment of the negotiated settlement amount in the form of a check or money order is enclosed for \$6,750.

Upon EPD execution of this Consent Order, EPD will take no further action against the Responsible Party for the specific violation cited in this Consent Order. EPD does not waive any enforcement action by EPD, the State, or any local agencies for any other past, present or future violations of the underground storage tank requirements or any other violations under any other statute not specifically described in this Consent Order. This Consent Order does not constitute a determination that the Responsible Party is an eligible Georgia Underground Storage Tank Trust Fund participant, nor does it resolve whether the Responsible Party will be eligible currently or in the future for Georgia Underground Storage Tank Trust Fund coverage for a release at the Site after the violations noted are corrected.

This Consent Order is binding on EPD and the Responsible Party signing below. This Consent Order is effective upon EPD's final approval below. Upon final approval, EPD shall mail a copy of the executed Consent Order to the Responsible Party signing below.

Execution of the Consent Order is in the sole discretion of the Director of EPD, or authorized delegate.

Company Bureau of Wastewater Treatment

By Sylvester Richards

Title (print) _____

Signature _____

Date _____

FINAL ORDER BY EPD this _____ day of _____, 200_____.

Carol A. Couch, Ph.D.
Director

CONSENT ORDER NO: EPD-UST-_____ - _____

GUST-75ECO
Revised 04/04

Exhibit C

Georgia Department of Natural Resources

Environmental Protection Division, Air Protection Branch

4244 International Parkway, Suite 120, Atlanta, Georgia 30354

Telephone: (404) 363-7000 • Fax: (404) 363-7100

Noel Holcomb, Commissioner
Carol A. Couch, Ph.D., Director

MAY 21 2008

Received
5/22/08

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Robert Bush
W.R.C. Manager
R.M. Clayton Water Reclamation Center
City of Atlanta
2440 Bolton Road, NW
Atlanta, GA 30318

RE: **Proposed Consent Order**
City of Atlanta, R. M. Clayton Facility
Atlanta, Georgia

Dear Mr. Bush:

The enclosed proposed Consent Order has been revised per comments received on May 13, 2007. The suggested changes have been made.

Please provide the necessary signature and return the signed Order to the above address with a check payable to the Georgia Department of Natural Resources within fifteen days of receipt of this letter. If you have any further questions, please contact Ms. Sherry Waldron at (404) 362-4853 or by e-mail at Sherry_Waldron@dnr.state.ga.us.

Sincerely,



Lou Musgrove
Program Manager
Stationary Source Compliance Program

LAM:sgw

Enclosure

c: David St. Pierre, City of Atlanta

Exhibit C

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

CONSENT ORDER

**CITY OF ATLANTA
ATLANTA, GEORGIA
FULTON COUNTY**

ORDER NO. EPD-AQC-

WHEREAS, the City of Atlanta (hereinafter called the "City") presently owns and operates a municipal sewage treatment facility (hereinafter called the "Facility") in Atlanta, Fulton County, Georgia; and

WHEREAS, such operation is subject to the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq., (hereinafter called the "Act") and the Georgia Rules for Air Quality Control, Chapter 391-3-1 (hereinafter called the "Rules"); and

WHEREAS, the Director of the Environmental Protection Division (hereinafter called the "Division") issued Part 70 Operating Permit No. 4952-121-0268-V-01-0 (hereinafter called the "Permit") to the City on March 7, 2007, for the continued operation of the Facility; and

WHEREAS, Condition 3.4.7 of the Permit requires the City to perform an annual tune-up of each boiler between February 1 and May 1, inclusive, of each calendar year; and

WHEREAS, Condition 5.2.1 of the Permit requires the City to install, calibrate, maintain, and operate a system to continuously monitor and record the oxygen content of the exhaust gases from sludge incinerators INC1 and INC2, pressure loss and scrubber flow rate through scrubbers SCRB1 and SCRB2 controlling emissions from the sludge incinerators, bypasses of the incinerator vent gases from the scrubbers, and the volume or mass of sludge flow to the sludge

Exhibit C

incinerators, or a system to utilize a total flow measuring device and calculate sludge flow in accordance with approved procedures; and

WHEREAS, each monitoring system is required to be certified to be accurate to the specifications provided in Condition 5.2.1 of the Permit; and

WHEREAS, Condition 5.2.3 of the Permit requires the City to monitor the daily mass emission rate of NO_x from each incinerator using the procedure prescribed in the Permit; and

WHEREAS, Condition 6.1.4 of the Permit requires the City to submit a semiannual report of any excess emissions, exceedances, and excursions as defined by Condition 6.1.7 of the Permit; and

WHEREAS, Condition 8.17.1 of the Permit requires the City to operate the source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions; and

WHEREAS, the City sent the semiannual report for the first half of 2007 covering the operating period of March 7, 2007 (issuance of the Permit) through June 30, 2007, on July 30, 2007; and

WHEREAS, a representative of the Division conducted an inspection of the Facility on July 23, 2007 (hereinafter called the "Inspection"); and

WHEREAS, review of the semiannual report for the first half of 2007 and records (Cimlicity data, summary sheets, NO_x calculations, and operator's logs) obtained during and as a follow-up to the inspection revealed several discrepancies between reported monitor downtime and excursions and those indicated by instrument and manually recorded data; and

WHEREAS, the City failed to perform the required annual tune-up during the required time frame for 2007; and

Exhibit C

WHEREAS, at the time of the Inspection, the City did not have documentation from the manufacturer that the monitoring systems are accurate to within the specification required by Condition 5.2.1 of the Permit; and

WHEREAS, based on review of the information provided, it was determined that the City failed to accurately and continuously monitor and record measurements of flow to the incinerators; and

WHEREAS, it was determined that the City failed to use the procedures provided to calculate the NO_x emission rates from each incinerator; and

WHEREAS, according to the semiannual report for the first half of 2007, venturi pressure drop excursions for SCRUB1 were 7.16% of operating time during the reporting period, scrubbant flow excursions for SCRUB2 were 23.4% of operating time, oxygen concentration excursions for the INC2 exhaust were 2.87% of operating time, and the oxygen CMS downtime for INC2 was 3.4% of operating time; and

WHEREAS, the Division sent a Notice of Violation letter to the City dated September 5, 2007, (hereinafter called the "NOV") alleging that the City violated Conditions 3.4.7, 5.2.1, 5.2.3, 6.1.4, and 8.17.1; and

WHEREAS, the NOV also detailed several data and recordkeeping discrepancies noted upon review of the data provided as a follow-up to the inspection; and

WHEREAS, the NOV requested a written response with the following information: (1) documentation that required boiler tune-ups to minimize NO_x emissions had been performed, the reasons why the City failed to perform the tune-ups, and any actions taken to ensure they would be conducted as required in the future; (2) documentation that the monitors meet the required specifications of Condition 5.2.1; (3) the reasons for not reporting the monitor downtime and

Exhibit C

excursions, any corrective actions to ensure complete and accurate reporting in the future, and an amended semiannual report for the first half of 2007; (4) any actions taken to correct the problems with accurately determining the amount of sludge flow to the incinerators; (5) revised NO_x emission calculations, and measures implemented to ensure complete and accurate calculations are maintained; (6) details of corrective actions taken to ensure problems with monitors are corrected expeditiously and to ensure excursions are also identified and corrected in a timely manner; and (7) any corrective actions taken to correct the data representation problems, and to identify errors in future, along with samples of Cimplicity data (the Facility's database of parameter records), summary sheets, and operators' logs to depict the changes; and

WHEREAS, the City submitted a response to the NOV dated November 1, 2007 that provided enhanced operator's log sheets for excursion, monitor downtime, and control device bypass tracking to address reporting deficiencies, as well as log sheets for manually recording parameter data in 15-minute intervals to address excess monitoring downtime. The response also included documentation of each monitoring device's accuracy, and documentation that a tune-up of the boiler had been conducted in October 2007. The response also indicated a new computer for Title V reporting had been installed, NO_x emissions calculations would be amended, and an amended semiannual report would be submitted to address the reporting deficiencies. In addition, the response indicated the City would increase calibration frequency of the incinerator belt scales and install a laser beam across the feed chute to detect incinerator feed to address deficiencies in determining the amount of sludge sent to the incinerators; and

WHEREAS, the NOV response did not include all of the information requested in the NOV; and

Exhibit C

WHEREAS, the Division issued an NOV follow-up and information request letter on January 16, 2008 that requested further information and data in order to assess the City's progress in addressing the issues in the NOV; and

WHEREAS, the City submitted the semiannual report for the second half of 2007, an amended semiannual report for the first half of 2007, operator's logs, daily data summary sheets, and documentation of belt scale calibrations on January 31, 2008; and

WHEREAS, according to the semiannual report for the second half of 2007, venturi pressure drop monitor downtime for SCRUB1 was 7.32% of operating time during the reporting period, scrubbant flow rate monitor downtime for SCRUB1 was 12.74% of operating time, oxygen CEMS downtime for the INC1 exhaust was 4.04% of operating time, oxygen CEMS downtime for the INC2 exhaust was 2.82% of operating time, and natural gas flow (used to calculate NO_x emissions) downtime for INC1 was 80.57% of operating time; and

WHEREAS, the Division sent a second information request to the City dated March 3, 2008; and

WHEREAS, the City submitted a response to the information request on March 13, 2008 that included updated NO_x emission calculations, hourly CEMS and CMS data, CEMS calibration reports, operator's logs, control device maintenance records, and an update on the installation of a laser beam across the feed chutes of the incinerators; and

WHEREAS, based on review of the data provided, reported bypass hours and number of excursions in the second semiannual report for 2007 are inconsistent with information available to the Division, and data obtained from the Cimplicity database is inconsistent with manually recorded data; and

Exhibit C

WHEREAS, the City and representatives of the Division held a meeting on April 10, 2008 to discuss the reporting and recordkeeping issues remaining. The City indicated that a new automated database system would be installed. This system, which would address the outstanding issues remaining, would be in place by July 1, 2008. The City indicated that operator's handwritten logs would be used for reporting purposes until the automated system is in place; and

WHEREAS, the Company and the Division wish to cooperate fully to resolve the issues in this Order.

NOW, THEREFORE, before taking any testimony and without adjudicating the merits of the parties' positions in this matter, and without admission or assignment of liability by or to the City, the parties hereby resolve the issues in this case by agreement and upon the order of the Director and the consent of the City as follows:

1. The City shall pay to the State of Georgia the sum of \$10,000 for the violations alleged in this Order.
2. By July 1, 2008, the City shall install and implement a system that reliably stores continuous monitoring data as required by Permit Condition 5.2.1, and identifies monitor downtime, excess emissions, exceedances, excursions, and reportable bypass hours. The City shall submit, by July 7, 2008, a certification to the Division that the system described above is installed and is being utilized. The City shall use this system to accurately and completely submit reports as required by Permit Condition 6.1.4.
3. Failure of the City to comply with any provisions of this Order may result in additional enforcement action by the Division.

Exhibit C

4. The parties enter into and execute this Consent Order solely for the purpose of resolving and disposing of the allegations set forth herein. This Order shall not constitute any finding, determination or adjudication of a violation of any state laws, rules, standards or requirements, nor does it constitute a finding or adjudication of liability to a third party or parties.
5. By agreement of the parties, this Order shall be final and effective immediately and shall not be appealable by the parties, and Respondent does hereby waive all administrative and judicial hearings on the terms and conditions of same.

It is so **ORDERED** and **AGREED** to this ____ day of _____, 2008.

CAROL A. COUCH
DIRECTOR
ENVIRONMENTAL PROTECTION DIVISION

THE CITY OF ATLANTA

BY: _____
NAME: _____
TITLE: _____
DATE: _____

A RESOLUTION BY

COUNCILMEMBER CARLA SMITH

08-R-1126

AUTHORIZING PAYMENT OF STIPULATED PENALTIES IMPOSED BY THE ENVIRONMENTAL PROTECTION AGENCY (EPA) AND THE ENVIRONMENTAL PROTECTION DIVISION OF THE DEPARTMENT OF NATURAL RESOURCES OF THE STATE OF GEORGIA (EPD) IN THE AMOUNT OF \$ _____ AS STIPULATED PENALTIES FOR THE VIOLATION OF CSO FECAL COLIFORM OPERATIONAL STANDARDS _____ PURSUANT TO THE CSO CONSENT DECREE, CIVIL ACTION FILE NO. 1:95-CV-2550-TWT; TO IDENTIFY THE SOURCE OF FUNDING; AND FOR OTHER PURPOSES.

WHEREAS, the City has experience a violation to the CSO Consent Decree set out in Exhibit "A" hereto; and

WHEREAS, this violation is subject to stipulated penalties imposed at the discretion of the Environmental Protection Agency (EPA) and the Environmental Protection Division of the Department of Natural Resources of the State of Georgia (EPD) pursuant to the CSO Consent Decree, Civil Action File No. 1:95-CV-2550-TWT; and

WHEREAS, the Department of Watershed Management of the City does not dispute the fact this violation did occur; and

WHEREAS, the payment to EPA and EPD of this assessment by the City does not constitute a finding or adjudication, is not to be evidence of a violation of state or federal laws by the City, nor does the City by its consent agree to any violations of state or federal laws or admit any liability to any third party or parties; and

WHEREAS, funds for this purpose are available in Fund, Account and Center Number 2J01-529017-Q31001; and

WHEREAS, the CSO Consent Decree, Section XI. O. similarly provides for payment of interest on late payment of stipulated penalties; and

WHEREAS, it is deemed to be in the best interest of the City to accept the proposed stipulated penalties and to pay the incident assessments to the Environmental Protection Agency (EPA) and the Environmental Protection Division of the Department of Natural Resources of the State of Georgia (EPD).

NOW, THEREFORE, BE AND IT IS RESOLVED BY THE COUNCIL OF THE CITY OF ATLANTA, GEORGIA as follows:

Section 1: That the Chief Financial Officer of the City of Atlanta is authorized to issue checks payable in the amount of \$ _____ to the **State of Georgia** and in the amount of \$ _____ to the **Treasurer, United States of America** as stipulated penalties imposed pursuant to the CSO Consent Decree at the discretion of the Environmental

Protection Agency and the Environmental Protection Division of the Department of Natural Resources of the State of Georgia.

Section 2: That said payments shall be charged to and paid from Fund, Account and Center Number 2J01 529017 Q30001.

Section 3: That all resolutions and parts of resolutions in conflict herewith be and are hereby waived in this instance only.

EXHIBIT A

The City is subject to stipulated penalties for violations of the CSO Consent Decree, per Section _____ as follows:

CSO Consent Decree Section

| Date | Facility | Colonies/100 ml | Penalty | Comment |
|-------------|-----------------|------------------------|----------------|----------------|
|-------------|-----------------|------------------------|----------------|----------------|